UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE BECHEN, RONALD BIENDSIEL, RON BOONE, VERA BOONELVIRA BUMPUS, EVANJELINA CLEEREMAN, SHIELA COCHRAN, LESLIE W. DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD KRESBACH, RICHARD LANGE, GLADYS MANZANET, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, GLORIA GOGERS, JEANNE SANCHEZ-BELL, CECILIA SCHLEIPP, and TRAVIS THYSSEN,

Case No. 11-CV-562

Plaintiffs.

TAMMY BALDWIN, GWENDOLYN MOORE, and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, AND SEAN P. DUFFY,

Intervenor-Defendants.

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MOTION OF BILL KRAUS, LOUIS FORTIS, JULILLY KOHLER, ANGELA KVIDERA, BRUCE THOMPSON, AND DON WALLACE TO APPEAR AS *AMICI CURIAE*

VOCES DE LA FRONTERA, INC., RAMIRO VARA,
OLGA WARA, JOSE PEREZ, AND ERICA RAMIREZ,

Plaintiffs,

Case No. 11-CV-1011

v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Accountability Board

Defendants.

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Bill Kraus, Louis Fortis, Julilly Kohler, Angela Kvidera, Bruce Thompson, and Don Wallace, by their attorney, move the court for an order granting them leave to appear as *amici curiae* in this action and leave to file their proposed brief with attachments, including their proposed state legislative redistricting map. In support of this motion these movants state as follows.

1. Movants are all citizens of the United States and of the State of Wisconsin and are registered voters.

2. Movants are organizing an unincorporated association known as Citizens for fair and Competitive Redistricting, the purpose of which is to promote legislative redistricting in Wisconsin that, consistent with other applicable legal principles and requirements, maximizes the potential for partisan competitiveness in every legislative district.

3. The redistricting in Act 43 that is the subject of the litigation in this case is the product of the first instance since the 1920's of redistricting by one party having control of both state legislative houses and the governorship. The plaintiffs and intervenor-plaintiffs in this action have asserted that the result is redistricting that is unconstitutional in a variety of ways. The members of Citizens for Fair and Competitive Redistricting agree.

4. Of particular concern to this group of citizens is the blatant political gerrymandering in the existing map. As a response to this, the members of Citizens for Fair and Competitive Redistricting wish to present a proposed redistricting map that has been expressly

designed to be fair and neutral. The map, drafted for the group by Frederick P. Kessler, achieves fairness by maximizing competitiveness in the legislative districts. This map shows that it is possible to create a fair redistricting map that maximizes competitiveness and solves the problem of excessive partisanship in the redistricting process.

WHEREFORE, the movants request that this court enter an order granting their motion to appear as *amici curiae* and accept for filing their proposed Brief of *Amici Curiae* together with attachments.

Dated this 24th day of January, 2012.

PAMELA S. MOORSHEAD

Attorney for *Amici* Curiae Bill Kraus, Louis Fortis, Julilly Kohler, Angela Kvidera, Bruce Thompson, and Don Wallace

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BRIEF OF *AMICI CURIAE*
BILL KRAUS, LOUIS FORTIS, JULILLY KOHLER, ANGELA KVIDERA, BRUCE THOMPSON, AND DON WALLACE

VOCES DE LA FRONTERA, INC., RAMIRO VARA,
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INTRODUCTION

The redistricting plan for state legislative districts created by Act 43 suffers from an array of constitutional infirmities as asserted by the Plaintiffs and Intervenor-Plaintiffs. In the likely event that Act 43 is found to be unconstitutional, the question facing this Court will be how best to step into the breach left by the legislature's failure and fashion a remedy.

In this regard, a group of concerned citizens which includes Bill Kraus, Louis Fortis, Julilly Kohler, Angela Kvidera, Bruce Thompson, and Don Wallace has formed "Citizens for Fair and Competitive Redistricting" and has requested permission to appear as *Amici Curiae* in this case for the purpose of placing before the Court a proposed neutral redistricting map. It is the position of this group ("the Citizens *Amici*") that in fashioning a redistricting plan, the touchstone should be neutrality. This view is consistent with the policies underlying equitable redistricting.

Frederick P. Kessler, a sitting member of the Wisconsin State Assembly and experienced redistricting consultant, has created the proposed map on behalf of this group. Mr. Kessler has long advocated an approach to redistricting that aims for neutrality by focusing on maximizing competitiveness. He has used this approach to create the redistricting map submitted with this brief. This proposed map illustrates that a fair and neutral map that complies with constitutional and statutory requirements is possible.

The Citizens *Amici* acknowledge that the submission of the proposed map is in some sense premature since the Court has yet to rule on the constitutionality of the existing legislative plan, and whether to return the redistricting task to the legislature or draw its own map in the event the Court does hold the current plan unconstitutional.

FACTS[1]

The Map Author's Experience

The state legislative redistricting map of the Citizens *Amici* is the product of many hours of work by Frederick P. Kessler. Mr. Kessler is an experienced national redistricting consultant. From 1960 to 1962, from 1964 to 1972, and from 2004 to the present, Mr. Kessler has been a member of the State Assembly. During his legislative tenure he served as chair of the Assembly Elections Committee and played a primary role in the creation of the redistricting plans enacted by the legislature following the 1970 census. From 1972 to 1981 and 1986 to 1988, Mr. Kessler served as a Circuit Court Judge in Milwaukee County. Following his service on the bench, he became a labor arbitrator. For 14 years, Mr. Kessler worked as a redistricting consultant. During that time, he was retained by 13 municipalities, political caucuses and other clients across the country. He also has served as a redistricting expert in litigation disputes.

The Map Methodology

In drafting the map, Mr. Kessler followed customary practice. As an initial matter, he considered the objective of population equality in each district for the assembly and senate seats, That requires the calculation of the ideal population for each assembly and senate district. For the Assembly, Mr. Kessler divided the total state population by the number of assembly seats (99). His calculation yielded an ideal assembly district population of 57,444. Similarly, for the Senate, Mr. Kessler divided the state's total population by the number of senate seats, which yielded an ideal senate district population of 172,233.

In the circumstance of a court-ordered redistricting plan of a state legislature, the Supreme Court has directed that population equality be sought with "little more than *de minimis*

[1] Unless another source is cited, the factual assertions contained herein are drawn from the accompanying Affidavit of Frederick P. Kessler and the data attached thereto.

variation" although it need not reflect the exactitude required for congressional redistricting. *Chapman v. Meier*, 420 U.S. 1, 27 & n.19 (1975). The revised redistricting map for assembly seats submitted by the Citizens *Amici* contains assembly districts ranging from 608 over to 655 under the ideal population. In percentages, the deviation ranges from 1.1 % above to 1.1 % below the ideal population. The revised redistricting map for the Senate seats submitted by the Citizens *Amici* contains senate districts ranging from 1,259 over to 1,314 under the ideal population. In percentages, the deviation ranges from 0.7% above to 0.8% below the ideal population.

Mr. Kessler then turned to Section 2 of the Voting Rights Act of 1965, as amended June 29, 1982, 42 U.S.C. § 1973. In *Thornburg v. Gingles*, 478 U.S. 30 (1986), the Supreme Court held that when there is a sufficient concentration of members of a minority group within any geographic area the candidate of choice of that minority community must have the potential to be elected. *Id.* at 50-51, 80. Based upon his review of the districts in Wisconsin and the census data, Mr. Kessler determined that the *Gingles* factors were present with respect to certain of the African-American population and certain of the Hispanic population in Milwaukee County. Consistent with the presence of the *Gingles* factors, the redistricting map of the Citizens *Amici* contains seven majority-minority African-American assembly districts and two majority-minority African-American Senate districts. The redistricting map contains one assembly districts with an effective Hispanic majority as well.

Mr. Kessler next considered other traditional districting principles in his drawing of the Citizens *Amici* map. He drew compact and contiguous proposed legislative districts, as is required by state law. He also worked to maintain the integrity of communities of interests, as reflected in such things as political subdivisions.

As a final criterion in his drawing of districts, Mr. Kessler considered political fairness and competitiveness. Mr. Kessler has taken political competitiveness into consideration in redistricting maps that he has drawn in his role as a consultant in other jurisdictions and in years past. In order to account for political competitiveness, Mr. Kessler needed a measure for competitiveness.

Wisconsin has historically been equally divided between Republicans and Democrats. Many close presidential and gubernatorial elections in Wisconsin have been close since the 1960's. Therefore, Mr. Kessler concluded that an aggregate of the last five presidential/gubernatorial elections would provide the best measure of competitiveness for political districts in the State of Wisconsin.

The results in those elections were as follows:

1) In 2002 Governor James Doyle defeated Acting Governor Scott McCallum with 52.1% of the vote;

(2) In 2004 Senator John Kerry Defeated President George W. Bush with 53.8% of the vote;

(3) In 2006 Governor James Doyle defeated Congressman Mark Green with 53.8% of the vote;

(4) In 2008 President Barack Obama defeated Senator John McCain with 57.1% of the vote; and

(5) In 2010 Governor Scott Walker defeated Mayor Tom Barrett with 52.9% of the vote.

Democrats received 53.4% and Republicans 46.6% of the aggregate votes. Therefore, Mr Kessler determined that a district voting over 53.4% Democratic is a Democratic district, and a

district voting over 46.6% Republican is a Republican district. This adjustment reflects nearly 50/50 partisan division within the state. Mr. Kessler noted that had the 1988 gubernatorial vote and the 2000 presidential vote been substituted for the 2008 presidential and 2010 gubernatorial elections, the aggregate vote would be 49.4% for Democrats and 50.6% for Republicans.

Based on those elections, Mr. Kessler set the objective of creating 132 state legislative districts, in which half of the districts voted more than 53.4% Democratic and half of the districts voted more than 46.6% Republican. The Democratic and Republican candidates had each prevailed in 66 of the districts. To accomplish this objective, Mr. Kessler created 48 Republican assembly districts, 49 Democratic assembly districts, and two districts that are equally divided. He then created 16 Democratic senate districts and 17 Republican senate districts. The Citizens *Amici* map provides that, if the results in state legislative races, as adjusted, track the results of the last five presidential/gubernatorial elections, one house in the legislature will have a Democratic and the other a Republican majority.

To further account for political competitiveness, Mr. Kessler attempted to maximize the number of internally competitive seats. With that consideration in mind, he created a total of 21 seats in the assembly in which the adjusted Democratic-Republican vote was between 52% and 48% in favor of one or the other of the presidential candidates. In the senate, 6 districts are competitive under that same standard.

Of the 21 competitive assembly seats eight lean democratic, eleven lean Republican, and two are equally divided.

Mr. Kessler used 48% to 52% as a proxy for competitiveness because there have been a number of elections in the State of Wisconsin where the party achieving 52% of the presidential vote in a particular legislative district nonetheless lost that district in a subsequent legislative

election. Districts in which one party achieves an even higher percentage of votes in a presidential election also elect legislators from the other party regularly.

The Map's Result

The Citizens *Amici*'s proposed legislative map achieves the objective of political competitiveness while complying with the requisite constitutional and statutory requirements, The map is being submitted to the Court concurrently with this brief and the accompanying motion to appear as *amici curiae*.

ARGUMENT

I. ACT 43 REPRESENTS AN EGGREGIOUS CASE OF PARTISAN GERRYMANDERING.

There is no shortage of constitutional defects in Act 43. The map proposed by the Citizens *Amici* would cure them all. But of particular concern to the Citizens *Amici* is the unabashed political gerrymandering that can be found permeating the entirety of Act 43's redistricting plan.

In *Davis v. Bandemer*, 478 U.S. 109 (1986). The United States Supreme Court considered a claim of partisan gerrymandering – specifically that a Republican-drawn redistricting map manipulated district boundaries in order to dilute the voting power of Democrats in violation of the Equal Protection Clause. *See id.* at 114-15. A plurality of the Court found such claims to be justiciable. In order to succeed with such a claim, the claimant must "prove both intentional discrimination against an identifiable political group and an actual discriminatory effect on that group." *Id.* at 127.

The Court in *Davis* noted that "[a]s long as redistricting is done by a legislature, it should not be difficult to prove that the likely political consequences of the reapportionment were intended." *Id.* at 129. This case is no exception to that rule. The intentional manipulation of

district lines to gut the voting power of Democrats could hardly be more obvious. First, the Republican majority threw out the entire statutory redistricting process that had been in place and in use since 1980 whereby local governments created ward lines, which would then be used in fashioning the districts. The Republican majority replaced the long-standing system with one in which they could create districts without regard to ward lines and present the redistricting plan to local governments as a *fait accompli,* requiring local governments to reconfigure ward lines to conform to the new districts. This turns Wisconsin's traditional redistricting principles as set forth in Article IV, Section 4 of the Wisconsin Constitution upside-down. [2]

Having disposed of decades of traditional redistricting principles by legislative sleight of hand, the Republican majority – no longer constrained by any existing lines – cleared the way for a rushed and largely secret redistricting process. The legislation was drafted at the behest of the Republican majority and first released to the public on July 8, 2011. On July 13, 2011 the one and only public hearing on the legislation was held. On July 15 the Senate Judiciary Committee adopted the legislation with minor amendments. The legislation was approved by the Senate on July 19th and by the Assembly on July 20th. It was signed into law on August 9, 2011.[3] Neither the citizens nor the Democratic minority had any meaningful opportunity to participate in this truncated process.

---

[2] The Wisconsin Constitution, Article IV, imposes the following requirements on redistricting:

> **Representatives to the Assembly, how chosen.** Section 4. [The] districts [shall] be bounded by county, precinct, town or ward lines, to consist of contiguous territory and be in as compact a form as practicable.
>
> **Senators, how chosen.** Section 5. The senators shall be elected by single districts of convenient contiguous territory, at the same time and in the same manner as members of the assembly are required to be chosen; and no assembly district shall be divided in the formation of a senate district. The senate districts shall be numbered in the regular series, and the senators shall be chosen alternatively from the odd and even-numbered districts for a term of 4 years.

[3] This time-line is admitted by the defendants in their answer to the Second Amended Complaint.

The manner in which the districts that resulted from this furtive process are weighted toward Republicans simply cannot have been accidental. All changes to the districts were made behind closed doors. No input was sought from Democratic legislators, and many long-term Democratic incumbents were placed in hostile, Republican-leaning districts while their existing districts were left without incumbents.

The legislation was intended to have a discriminatory effect, and it does in fact have such an effect. The neutral approach used by Mr. Kessler to eliminate political gerrymandering actually provides some of the best evidence of the discriminatory impact of the gerrymandering in Act 43 on Democratic voters. Using the votes cast for the Democratic and Republican candidates in the last five presidential and gubernatorial elections, Mr. Kessler determined that Act 43 has resulted in 39 assembly districts with a Democratic majority and 60 with a Republican majority. Similarly, Act 43 created 14 senate districts with a Democratic majority while 19 are majority Republican.

Act 43 represents an opportunistic use by the current Republican majority of its power to shut the Democratic half of the state out of the political process for the foreseeable future. This has long been the express goal of Republican legislators. *See, e.g.*, Wisconsin State Journal, July 31, 1998, at 11a (quoting then Assembly Speaker Scott Jensen as telling fellow Republicans that "'[w]ith redistricting coming up in the year 2000' . . . a larger Assembly margin 'could lock in Republican control of the Assembly for a generation'").

As the plurality in *Davis* stated, "unconstitutional discrimination occurs . . . when the electoral system is arranged in a manner that will consistently degrade a voter's or a group of voters' influence on the political process as a whole." *Id.* at 132. If allowed to stand, Act 43 will

deliberately and systematically degrade the influence of Democratic voters in this state for at least a decade if not "for a generation." This is a violation of the Equal Protection Clause.

II. THE MAP SUBMITTED BY THE CITIZENS *AMICI* PROVIDES A NEUTRAL CURE FOR THE CONSTITUTIONAL INFIRMITIES OF ACT 43.

The principle of "neutrality" has long been recognized as an important element of the redistricting process. This arises from the most basic notions of our democratic process. As Professor Peter H. Schuck explains in his article, *The Thickest Thicket: Partisan Gerrymandering and Judicial Regulation of Politics*, 87 Colum. L. Rev. 1325 (1987), legislative redistricting as an element of representative democracy "should be neutral, unbiased and 'outcome blind'; that is, it should not systematically increase the probability that one political claim will prevail over another." *Id.* at 1348-49.

Fair and neutral redistricting is not merely an abstract ideal; it is possible as a matter of practical reality. This is proved by the redistricting plan submitted by the Citizens *Amici* in this case – a plan that meets the constitutional and statutory requirements and is fair and neutral.

The Citizens *Amici* have submitted for the court's consideration a redistricting plan that is not based upon the challenged legislative plan, but is a complete departure from it. In doing so, the *Amici* recognize that a court is ordinarily not free to discard a legislatively enacted plan altogether. This long-standing principle was very recently reiterated by the Wisconsin Supreme Court:

> "[F]aced with the necessity of drawing district lines by judicial order, a court as a general rule should be guided by the legislative policies" underlying the state plan – even one that was itself unenforceable – "to the extent those policies do not lead to violations of the Constitution or the Voting Rights Act."

Perry v. Perez, 565 U.S. ____ (2012), *quoting, Abrams v. Johnson*, 521 U.S. 74, 79 (1997). Put another way, a court ordered plan must not reject state policy choices "more than [is]

necessary to meet the specific constitutional violations involved." *Upham v. Seamon*, 456 U.S. 37, 42 (1982).

However, the Citizens *Amici* submit that such deference is not required (or even possible) in a case such as this. First, the political gerrymander created by Act 43 is not confined to a few particular districts. The Equal Protection claim is not that certain unconstitutional districts were created, but that the plan violates the Equal Protection Clause by degrading state-wide the ability of Democrats to influence the political process. The United States Supreme Court has acknowledged the unique nature of a claim of "statewide political gerrymandering" as differentiated from a claim involving "individual districts." *Davis*, 478 U.S. at 132. In *Davis*, the Court noted that "Although the statewide discrimination asserted here was allegedly accomplished through the manipulation of individual district lines, the focus of the Equal Protection inquiry is necessarily somewhat different from that involved in the review of individual districts." *Id.* at 127.[4]

In this case, the legislative plan is so completely permeated by political gerrymandering that it is impossible to separate infected districts from constitutional ones. To the extent that any "legislative policy" is discernible in the plan, it is an unconstitutional one – a policy of manipulating the district lines statewide to create entrenched Republican super-majorities in both legislative bodies and effectively shut the Democratic minority out of the political process. A complete re-write is the only remedy for the Equal Protection violation.

[4] The Court in *Davis* found that the Democratic plaintiffs had not shown sufficient discriminatory effect to prove their Equal Protection claim. Therefore, the Court did not address to what extent the district court's redistricting plan did or was required to give deference to the legislative plan.

A. The Legislative Redistricting Map of the Citizens Amici Best Comports With Judicial Neutrality.

The legislative redistricting map of the Citizens *Amici* allows for the attainment of neutrality by providing for, as reasonably as possible, political competitiveness in the assembly and senate districts in Wisconsin. Indeed, political competitiveness seems particularly well suited to achieving neutrality. *Webster's Third New International Dictionary* (1971) defines "neutrality" as "a condition of being uninvolved in contests or controversies between others or of refraining from taking part on either side of such contest or controversy" (p. 1522). What better way to refrain from taking part on either side of a contest than by fostering competitiveness where no results are predicted?

The involvement of political competitiveness in redistricting is well supported and critical. In *Reynolds v. Sims*, 377 U.S. 533 (1964), the Court emphasized that "[t]he achieving of fair and effective representation for all citizens is concededly the basic aim of legislative apportionment." *Id.* at 565-66. Fair and effective representation is most likely to obtain when there is competition in the political process.

As the Supreme Court observed in *Williams v. Rhodes*, 393 U.S. 23 (1968), "[c]ompetition in ideas and governmental policies is at the core of our electoral process and of the First Amendment freedoms." *Id.* at 32. Without competition in the electoral process, voter participation in politics reaches its lowest point. Political competition has the effect of giving voters more choice, increasing voter participation, making elected officials more responsive to voters, and divesting (at least to some extent) control from entrenched interests. *See* Schuck, *The Thickest Thicket*, 87 Colum. L. Rev. at 1337. A goal of redistricting, then, should be to devise districts where voters have an effective and undiluted vote. S*ee also Gaffney v. Cummings*, 412 U.S. 735, 753 (1973) ("[t]he very essence of districting is to produce a different—a more

'politically fair' result—than would be reached with elections at large, in which the winning party would take 100% of the legislative seats").

Professor Samuel Issacharoff has decried the sort of partisan redistricting that results in "geographical divisions [with] clearly identified zones of influence." *Gerrymandering and Political Cartels*, 116 Harv. L. Rev. 593, 623 (2002). He compares this type of partisan redistricting action to the behavior of economic competitors who agree to a horizontal division of the market that minimizes competition. *Id.* at 21-23. And he advocates for the same type of legal restraints imposed on partisan competitors as are imposed on economic competitors. *See id.*

The analogy is apt. Where economic competitors make horizontal agreements in the economic marketplace, the antitrust laws seek to curb that behavior by holding it illegal per se, *see, e.g.*, *United States v. Sealy, Inc.*, 388 U.S. 350, 355-58 (1967), or violative of the "rule of reason," *see, e.g.*, *FTC v. Indiana Federation of Dentists*, 476 U.S. 447, 456-59 (1986). Providing *voters* with protection from the same sort of horizontal non-competition agreements makes considerable sense. After all, the antitrust laws are designed to protect competition (and thus consumers), not competitors. *See Cargill, Inc. v. Monfort of Colorado, Inc.*, 479 U.S. 104, 115 (1986). And, as Professor Issacharoff notes, there is equal risk in the political marketplace that "anticompetitive behavior will compromise the ability of selection to reveal true consumer preferences." Issacharoff, *Gerrymandering*, at 623.

Moreover, as in the economic marketplace, anticompetitive action in the political marketplace has an ongoing harmful effect on the voter. Not only does such behavior hurt the voter in the first instance when he or she casts a vote, it harms equally in the second and third instances. When a political party becomes entrenched in a state through the districts it has

drawn, a voter loses the ability to voice effectively his or her displeasure with the incumbent party in subsequent elections, a result that is magnified in a state such as Wisconsin where there are no term limits for state legislators.

Through a consideration of political competitiveness, the legislative redistricting plans submitted by the Citizens *Amici* eliminate the concern that partisan district drawing will "lock in" districts for the incumbent party for a generation. "Political competitiveness" is used in the most commonsense of ways. As its proxy for competitiveness, the Citizens *Amici* plan uses the percentages of votes cast for the Republican and Democratic candidates in the last five presidential and gubernatorial elections. The breakdown of votes cast in the last five statewide elections is a good proxy for competitiveness because it indicates that legislative control will reflect the changing voting of the electorate.

To achieve political competitiveness, the legislative map of the Citizens *Amici* results in a situation where there are an equal number (66) of districts in which there are Democratic and Republican majorities. As a result, in the Citizens *Amici* map, the Assembly has a Democratic majority with 49 Democratic districts, 48 Republican districts, and two districts that are equally divided. The Senate has a Republican majority with 17 Republican seats and 16 Democratic seats.

The Citizens *Amici* redistricting map has the further virtue of maximizing internally competitive seats. Mr. Kessler determined that 52% served well as a proxy for competitiveness because there have been a number of elections in the State of Wisconsin where the party achieving 52% of the presidential vote in a particular legislative district lost the district in a subsequent legislative election. Indeed, some legislative districts in which one party has achieved an even higher percentage have also elected legislators from the other party.

In the Assembly, 21 seats are internally competitive; that is, the Republican-Democratic vote is between 52% and 48% in favor of one over the other candidate. In the Senate under this same standard, 6 seats are internally competitive. As demonstrated by these outcomes, the legislative map of the Citizens *Amici* allows for political competitiveness and, thus, effective voter selection in a maximum number of legislative seats in Wisconsin. The result is that these seats will truly be put to the "vote" in the next election and especially in any election in which the seat may be open.

B. The Legislative Redistricting Map of the Citizens *Amici* Satisfies Constitutional and Statutory Requirements.

Of course, the objective of achieving political competitiveness cannot supplant the constitutional and statutory factors that the Court must consider in devising district boundaries. But the legislative redistricting map submitted by the Citizens *Amici* assures political competitiveness *in addition to* complying with constitutional and statutory requirements.

1. The requirement of population equality is satisfied.

The starting place for the inquiry into population equality is the longstanding rule of "one person one vote" articulated in *Baker v. Carr*, 369 U.S. 186 (1962). In *Reynolds*, the Court considered population equality as applied to state legislative districts and concluded that, while "a State [must] make an honest and good faith effort to construct districts . . . , [m]athematical exactness or precision is hardly a workable constitutional requirement." 377 U.S. at 577. Later in *Chapman*, the Court made clear that the exacting standard applicable to congressional redistricting does not apply to legislative redistricting, even where court-ordered redistricting is involved. *See* 420 U.S. at 27 n.19. In court-ordered plans for state legislative redistricting, the objective must be population equality with "little more than *de minimis* variation." *Id.* at 27.

And even that standard may not govern where "important and significant state considerations rationally mandate departure from these standards" and a court articulates those considerations. *Id.*

It is true that the numerical equality of population among districts in the Citizens *Amici's* map is slightly less than the numerical equality among districts in Act 43. This is due to the fact that, unlike the drafters of the legislative plan, Mr. Kessler has created districts that as much as possible follow the existing ward lines as required by Article IV, Section 4 of the Wisconsin constitution. Even so, the population variation in the Citizens *Amici* map is less than 1.3% – well within standards required by law.

The Citizens *Amici* map has struck the appropriate balance between numerical population equality and other competing concerns. Twenty years ago the Court was called upon to choose from among competing maps in *Prosser v. Elections Board,* 793 F. Supp. 859, 865 (E.D. Wis. 1992). The Court rejected at least one plan that offered "perfect numerical equality" because it did so at the expense of other important factors, namely, the preservation of wards, the administrative units of government by which Wisconsin voters vote. *See id.* at 865-66.

2. The requirements of Section 2 of the Voting Rights Act are satisfied.

The legislative redistricting map of the Citizens *Amici* also complies with the requirements of Section 2 of the Voting Rights Act of 1965 and its amendments. As the Court explained in *Gingles*, the purpose underlying Section 2 of the Voting Rights Act of 1965 and its amendments is to avoid vote dilution of minority districting such that "the political process is equally open to minority voters." 478 U.S. at 79. Thus, a majority-minority district is appropriate where (1) a minority group is "sufficiently large and geographically compact to constitute a majority," (2) the minority group is "politically cohesive," and (3) the majority votes

"sufficiently as a block to enable it – in the absence of special circumstances. . . – usually to defeat the minority's preferred candidate." *Id.* at 50-51.

A review of the districts and the census data shows that there is one geographic area – Milwaukee County – where there is a sufficient concentration of two minority groups such that creation of majority-minority districts is appropriate. In *Ketchum v. Byrne*, 740 F.2d 1398, 1413, 1415-16 (7th Cir. 1984), the court set a 65% population as a rule of thumb for approximating a sufficient concentration of a minority group. In *Prosser*, the court adopted a 60% population as a rule of thumb in part because of the fact that individuals in Wisconsin can register to vote on the day of the election. *See* 793 F. Supp. at 869-70. As African-American candidates run for high offices, African-American voting participation has increased and in some elections, such as the 2004 partisan primary and 2008 general election, has exceeded non-Hispanic white voter participation. .

Consistent with the presence of the *Gingles* factors and these rules of thumb, the Citizens *Amici* redistricting map contains 7 majority-minority African-American assembly districts in Milwaukee County. In those districts, the highest population percentage of African-Americans is 58.4% and the lowest percentage is 56.1% of African-Americans. If only voting-age African-Americans are considered, the highest population percentage is 54.5% and the lowest population percentage is slightly above 50% African-American. African-American voting age percentage exceeds the non-Hispanic white population by 10% in those seven districts. The Citizens *Amici* map contains 2 majority-minority African-American senate districts in Milwaukee County. In those districts, the highest population percentage of African-Americans is 58.1% and the lowest population percentage is 55.9%. Finally, the Citizens *Amici* redistricting map contains 1 majority-minority Hispanic assembly district in Milwaukee County. That district has a Hispanic

population percentage of 67.82 % of all people over 18 or 52.4% of voters. The Citizens *Amici* redistricting map thus fully complies with the requirements of Section 2 of the Voting Rights Act.

3. Other traditional districting principles are satisfied.

In addition to meeting these requirements, the legislative redistricting map of the Citizens *Amici* is consistent with other traditional districting principles. In Wisconsin, maintaining the integrity of political subdivisions is an important redistricting concern. The districts in the legislative map submitted by the Citizens *Amici* substantially maintain the integrity of the State's political subdivisions.

Incumbency continuity, if not a paramount consideration, is a legitimate consideration in redistricting. *Bush v. Vera*, 517 U.S. 952, 964 (1996). In that regard, the map submitted by the Citizens *Amici* minimizes the situations where incumbents of the same party will reside in the same district. The Citizens *Amici* map has created only six districts incumbents of the same party would have to run against each other – three involving Republicans and three involving Democrats. In two of those districts – one for each party – at least one of the incumbents has announced an intention not to seek reelection. In the remaining districts there is an open seat adjacent containing portions of the district of one of the incumbents. The Citizens *Amici* map results in one district which is highly competitive where incumbents of opposing parties would run against each other.

In sum, then, the Citizens *Amici* revised legislative redistricting map comports best with judicial neutrality. This plan complies with constitutional and statutory requirements and results in competitiveness in a manner that is not disruptive of contiguity and compactness.

CONCLUSION

For the foregoing reasons, the Court should find Act 43 unconstitutional and substitute the attached map for the 2012 election or draw its own map consistent with the principles embodied in the Citizens *Amici* map.

Dated this 24th day of January, 2012.

PAMELA S. MOORSHEAD

Attorney for *Amici Curiae* Bill Kraus, Louis Fortis, Julilly Kohler, Angela Kvidera, Bruce Thompson, and Don Wallace

_____/s/_____
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CERTIFICATE OF COMPLIANCE

I hereby certify that this brief conforms to the length and format requirements set forth in Fed. R. App. P. 32 and Circuit Rule 32 of the United States Court of Appeals for the Seventh Circuit. This brief was prepared using Microsoft Word 2010, and its length as set forth by that word processing system is 4,900 words including headings, footnotes, and quotations, but excluding the caption and any certificates of counsel.

/s/
Pamela Moorshead

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE BECHEN, RONALD BIENDSIEL, RON BOONE, VERA BOONELVIRA BUMPUS, EVANJELINA CLEEREMAN, SHIELA COCHRAN, LESLIE W. DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD KRESBACH, RICHARD LANGE, GLADYS MANZANET, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, GLORIA GOGERS, JEANNE SANCHEZ-BELL, CECILIA SCHLEIPP, and TRAVIS THYSSEN,

Case No. 11-CV-562

Plaintiffs.

TAMMY BALDWIN, GWENDOLYN MOORE, and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, AND SEAN P. DUFFY,

Intervenor-Defendants.

(caption continued on next page)

AFFIDAVIT OF FREDERICK P. KESSLER

VOCES DE LA FRONTERA, INC., RAMIRO VARA,
OLGA WARA, JOSE PEREZ, AND ERICA RAMIREZ,

Plaintiffs,

Case No. 11-CV-1011

v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Accountability Board

Defendants.

STATE OF WISCONSIN)
)ss.
MILWAUKEE COUNTY)

FREDERICK P. KESSLER, being first duly sworn, states as follows:

1. I am a resident of Milwaukee, Wisconsin residing at 11221 West Sanctuary Drive. I am a registered voter in the City of Milwaukee.

2. I am making this affidavit on behalf of Bill Kraus, Louis Fortis, Julilly Kohler, Angela Kvidera, Bruce Thompson, and Don Wallace. They have formed the group "Citizens for Fair and Competitive Redistricting." They are requesting permission to participate in this action as *amici curiae*. They are advocates of redistricting that takes into account competitiveness as a criterion for redistricting. They are filing a proposed map for state legislative redistricting in the State of Wisconsin that is intended to maximize the number of districts in which competitive elections between the candidates of the Democratic and Republican parties can be expected. I am the author of that map, and I am making this affidavit to explain how and why I created the districts in it.

Background

I am an experienced national redistricting consultant. From 1960 to 1962, from 1964 to 1972, and from 2004 to the present, I have been a member of the State Assembly. During my legislative tenure I served as chair of the Assembly Elections Committee and played a primary role in the creation of the redistricting plans enacted by the legislature following the 1970 census. From 1972 to 1981 and 1986 to 1988, I served as a Circuit Court Judge in Milwaukee County. Following my service on the bench, I became a labor arbitrator. For 14 years, I worked as a redistricting consultant. During that time, I was retained by 13 municipalities, political caucuses and other clients across the country. I also have served as a redistricting expert in litigation disputes.

Methodology

3. I have spent approximately 300 hours reviewing data and drafting the series of maps, which resulted in the amended legislative redistricting map we have submitted. I began with the raw data provided by the Wisconsin Census Office showing population, racial breakdowns in the population, and voting patterns.

4. I began the drafting process by ascertaining the population of the State of Wisconsin as determined on the basis of the U.S. Bureau of Census 2010 data.

5. Based on my review of the census materials and my experience, I determined that the existing redistricting map adopted by the 2011 Wisconsin legislature for state legislative seats was in violation of the state and federal constitutions as asserted by the plaintiffs and intervening plaintiffs in this case. I thus concluded that new redistricting maps needed to be drafted to redress these violations.

6. The first step of the analysis requires that there be population equality in each district. In the legislative context, that determination was made dividing the total population of the State of Wisconsin by 99, the number of assembly seats. That calculation yields an ideal assembly district of 57,444 people.

7. I did the calculation for state senate seats in a similar fashion by dividing the total population of Wisconsin by 33, which is the number of senate districts. The result was an ideal state senate district of 172,333.

8. In *Karcher v. Daggett*, 462 U.S. 725, 730 (1983), the Supreme Court explained that states must make "a good faith effort" at population equality. In practical terms that, in my experience, means that the standard deviation for legislative districts should be a 2% variation from the ideal, which is further consistent with the requirement set out in *Kirkpatrick v. Preisler*, 394 U.S. 526, 533-34 (1969), which calls for a deviation as minimum as practicable.

9. Using the 2% deviation standard would permit no assembly district to deviate in population from the ideal number by no more than 1,149 people, and would permit no senate district to deviate in population from the ideal number by no more than 3,445 people.

10. A 2% deviation more or less is consistent with the State legislative and court cases involving Wisconsin redistricting since the 1970 census. I intended that the deviation for the senate and assembly districts be below the 10% total population that is considered an acceptable deviation for state and local government legislative bodies.

11. The map I have drafted contains Assembly districts ranging from 608 persons over to 655 under the ideal polulation. In percentages, the deviation is a maximum of 1.1% in each direction. The proposed map contains Senate districts ranging from 1,259 persons above to 1,314 below the ideal population. The deviation in percentages is from 0.7 above to 0.8 below.

12. It should be noted that the degree of consistency of population among districts I achieved using this standard is not quite as great as the population consistency among districts in Act 43. This is due to the fact, that unlike the drafters of the legislative map, I drew districts following the existing ward lines as required by the Wisconsin constitution [Art. IV, §4]. Utilizing the existing ward lines prevented me from obtaining the same level of precision as to population, as the legislation which overrode the existing law and process, and changed the ward boundaries in Act 43. However, the population variations in the map I created are well within standards required by law.

13. The next criterion that I considered in my map drafting was Section 2 of the Voting Rights Act. I wanted to ensure that the map complied with it.

14. Based on my review of the data and my drafting, I can state that the map complies with the Federal Voting Rights Act, which prohibits "minority vote dilution." If there is a sufficient concentration of members of a racial or defined ethnic minority within a geographic area, the candidate of choice of that minority community must have a chance to be nominated or elected. The Voting Rights Act further requires that population proportionality be considered in determining the number of minority districts.

15. *Thornbury v. Gingles*, 478 U.S. 30 (1986) provides that a sufficient concentration of minority population exists where (1) the minority group is "sufficiently large and geographically compact to constitute a majority," (2) the minority group is "politically cohesive," and (3) the white majority voters vote "sufficiently as a block to enable it -- in the absence of special circumstances -- usually to defeat the minority's preferred candidate."

16. In my review of the existing districts and census data, I determined that these factors required the consideration of the African American population in Milwaukee County in

the creation of legislative seats. Although, the African-American population in the State of Wisconsin is 6.7% of the total population, there is a sufficient concentration of African-Americans in Milwaukee County such that proportionality must be reflected in the districts drawn there. Given the existence of the *Gingles* factors, seven such majority-minority assembly districts and two such majority-minority senate districts should be drawn and were drawn. In those districts, the highest population percentage of African-Americans is 58.4% and the lowest percentage is 56.1% of African-Americans. If only voting-age African-Americans are considered, the highest population percentage is 54.5% and the lowest population percentage is slightly above 50% African-American. The Citizens *Amici* map contains 2 majority-minority African-American Senate districts in Milwaukee County. In those districts, the highest population percentage of African-Americans is 58.1% and the lowest population percentage is 55.9%.

17. With respect to other minority populations, the Hispanic population of the State of Wisconsin is 5.9%. According to census data, only 52% of the Hispanics in Wisconsin were U.S. citizens. The only area where there is a sufficient concentration of Hispanic population is in Milwaukee County where a single legislative district could be created with an effective Hispanic majority, that is, a district with enough Hispanic citizens over the age of eighteen. I conclude that over 70% of the total population must be Hispanic to meet this criterion.

18. For that reason, I created a district with a population which is slightly over 71% Hispanic. In that district 67.82% of the persons over 18 were Hispanic; 52.4% of the voters were Hispanic.

19. As demonstrated above, while majority-minority districts do exist in my legislative map, those districts were not created by "subordinating traditional districting criteria to the use of race," which is forbidden. *See Bush v. Cruz*, 116 S.Ct. 1941 (1961).

20. As a final criterion, I took into consideration political competitiveness as a whole in drafting the redistricting map.

21. I have factored in political competitiveness in other redistricting maps that I have drawn and in Assembly Joint Resolution 78, which I introduced in the 2011 Wisconsin legislative session. I had introduced similar proposals in each of the three preceding legislative sessions. *See*, 2005 Assembly Jt. Res. 41; 2007 Assembly Jt. Res. 63; 2009 Assembly Jt. Res. 29, all of which required competitiveness and set out the criteria for creating competitive districts.

22. In order to account for political competitiveness in the redistricting, I needed a measure of competitiveness. I decided that the percentages of votes cast for the Republican and Democratic candidates in the last five presidential and gubernatorial elections would provide the best measure of competitiveness for political districts in the State of Wisconsin. (This was the same criterion used to determine competitiveness in the four Assembly Joint Resolutions noted above).

23. The results in those elections were as follows:

a) In 2002 Governor James Doyle defeated Acting Governor Scott McCallum with 52.1% of the vote;

(b) In 2004 Senator John Kerry Defeated President George W. Bush with 53.8% of the vote;

(c) In 2006 Governor James Doyle defeated Congressman Mark Green with 53.8% of the vote;

(d) In 2008 President Barack Obama defeated Senator John McCain with 57.1% of the vote; and

(e) In 2010 Governor Scott Walker defeated Mayor Tom Barrett with 52.9% of the vote.

24. Democrats received 53.4% and Republicans 46.6% of the aggregate votes. Therefore, I determined that a district voting over 53.4% Democratic is a Democratic district, and a district voting over 46.6% Republican is a Republican district. This adjustment reflects the nearly 50/50 partisan division in the state. I noted that had the 1988 gubernatorial vote and the 2000 presidential vote been substituted for the 2008 presidential and 2010 gubernatorial elections, the aggregate vote would be 49.4% for the Democrats and 50.6% for the Republicans.

25. Based on those elections, I set the objective of creating 132 state legislative districts, in which half of the districts voted more than 53.4% Democratic and half of the districts voted more than 46.6% Republican. The Democratic and Republican candidates had each prevailed in 66 of the districts.

26. To do so, I created circumstances in which one house in the legislature had a Democratic majority, and the other a Republican majority. Specifically, I created 48 Republican assembly districts, 49 Democratic assembly districts, and two equally divided districts. I then created 16 Democratic senate districts and 17 Republican senate districts.

27. My initial drafts of the maps resulted in districts that were more partisan towards one party than the objectives required. As a result, I went back to the computer and changed district boundaries to create a map consistent with the objectives stated above.

28. In accounting for political competitiveness in the legislative seats, I sought to ensure the maximum number of internally competitive seats.

29. With that consideration in mind, I created a total of 21 seats in the assembly in which the adjusted Democratic-Republican vote was between 52% and 48% in favor of one or the other of the presidential candidates. In the senate, 6 districts are competitive under that same standard.

30. Those 21 competitive assembly seats are denominated as follows: 8 Democratic-leaning, 11 Republican-leaning and 2 equally divided.

31. I used 48% to 52% as a proxy for competitiveness because there have been a number of elections in the State of Wisconsin where the party achieving 52% of the presidential vote in a particular legislative district nonetheless lost that district in a subsequent legislative election. Districts in which one party achieves an even higher percentage of votes in a presidential election also elect legislators from the other party regularly.

32. Accordingly, there was not an insurmountable barrier to the legislative seats changing party hands. Three of the Republican majority senate districts have elected Democrats and three Democratic majority districts have elected Republicans. They are likely to be re-elected under my proposed map.

33 Last, I examined the map to determine its effect on incumbent office-holders. Based on my examination, another consideration for drafting legislative districts is affording a measure of incumbent continuity. I amended my original legislative maps to reduce the number of same party incumbent conflicts. That is, I wanted to minimize the situations where, in creating districts, I put incumbents of the same party into the same district, thus requiring that the two incumbents run against each other in a subsequent election.

34 To achieve this result, I tracked down incumbent street addresses from a variety of sources, including existing incumbent addresses from the *Wisconsin Blue Book* and the Wisconsin Census Office website on the Internet.

35. As a result of my efforts, there are only six of the districts in the amended maps where incumbents of the same party would have to run against each other – three involving Republicans and three involving Democrats. In two of those districts – one for each party – at least one of the incumbents has announced an intention not to seek reelection

36. There is one additional district in my proposed map where incumbents of opposing parties would run against each other, the 23rd Assembly District with Republican Jim Ott facing Democrat Sandy Paasch.

37. I then created the matrices attached as Exhibits A and B using the raw data provided by the Wisconsin Census Office and showing the values I achieved in my redistricting map relating to population breakdown, racial breakdowns and voting patterns by district. Exhibit A relates to the assembly districts I created, and Exhibit B relates to the senate districts. The final column on each matrix reflects the adjustment in voting patterns, by district, to reflect a 50/50 divided statewide electorate.

38. I have applied the same methodology I used to create competitive districts in my map to a study of the redistricting map adopted by Act 43. Using the votes cast for the democratic and republican candidates in the last five presidential and gubernatorial elections, I have determined that Act 43 has resulted in 39 assembly districts with a Democratic majority and 60 with a Republican majority. Similarly, Act 43 created 14 senate districts with a Democratic majority while 19 are majority Republican.

Dated: January 23, 2012

/s/
Frederick P. Kessler

Subscribed and sworn to before me
this 23rd day of January, 2012

/s/
Dudley A. Williams
Notary Public, State of Wisconsin
My Commission: is permanent

Rep. Kessler's Plan D - Exec Elections

DISTRICT	TAPERSONS	Target	Dev.	WHITE	BLACK	HISPANIC	ASIAN	AMINDIAN	Senate	Target	Dev.	Difference	PERSONS18
1	57,024	57,444	-0.7%	54,289	341	1,253	769	278					43,900
2	57,768	57,444	0.6%	50,677	815	2,248	1,492	2,383					42,567
3	57,064	57,444	-0.7%	54,132	365	1,350	632	390					40,865
									171,856	172,333	-0.3%	-477	
4	57,270	57,444	-0.3%	51,647	1,306	1,903	1,461	798					43,770
5	57,304	57,444	-0.2%	54,332	205	1,775	285	648					42,991
6	57,373	57,444	-0.1%	53,646	264	870	428	2,048					41,586
									171,947	172,333	-0.2%	-386	
7	57,009	57,444	-0.8%	45,118	2,044	6,881	2,003	690					45,716
8	57,626	57,444	0.3%	8,686	5,478	41,353	1,090	747					37,353
9	58,186	57,444	1.3%	20,797	3,579	30,955	1,776	801					40,359
									172,821	172,333	0.3%	488	
10	57,241	57,444	-0.4%	22,143	31,146	1,779	1,417	257					41,656
11	57,809	57,444	0.6%	18,061	33,080	2,407	3,483	242					39,833
12	57,507	57,444	0.1%	18,531	33,240	2,438	3,333	354					39,638
									172,557	172,333	0.1%	224	
13	58,011	57,444	1.0%	47,161	6,151	2,169	1,654	344					44,953
14	56,950	57,444	-0.9%	49,829	1,274	2,868	2,456	345					45,173
15	57,806	57,444	0.6%	45,793	3,935	6,700	1,196	835					45,887
									172,767	172,333	0.3%	434	
16	56,892	57,444	-1.0%	18,101	33,225	2,845	1,917	272					44,056
17	56,985	57,444	-0.8%	18,824	33,213	2,162	1,957	303					40,849
18	57,142	57,444	-0.5%	16,570	32,968	3,217	3,388	404					39,798
									171,019	172,333	-0.8%	-1,314	
19	58,052	57,444	1.1%	49,053	2,721	3,193	2,342	451					53,540
20	58,001	57,444	1.0%	44,744	1,828	7,855	2,600	706					45,221
21	57,313	57,444	-0.2%	48,737	1,593	4,687	1,436	653					44,223
									173,366	172,333	0.6%	1,033	
22	57,339	57,444	-0.2%	20,245	32,209	3,011	1,075	254					41,585
23	57,711	57,444	0.5%	51,726	1,510	1,682	2,316	249					44,469
24	57,076	57,444	-0.6%	54,507	445	1,164	635	234					43,071
									172,116	172,333	-0.1%	-207	
25	56,879	57,444	-1.0%	51,615	545	2,042	2,030	493					44,534
26	57,134	57,444	-0.5%	45,470	1,227	5,102	4,734	419					42,886
27	57,195	57,444	-0.4%	54,743	338	1,238	295	470					45,107
									171,208	172,333	-0.7%	-1,125	
28	57,384	57,444	-0.1%	55,043	405	839	454	430					42,724
29	57,625	57,444	0.3%	54,106	625	908	1,460	381					46,213
30	57,209	57,444	-0.4%	54,180	470	1,199	835	392					43,459
									172,218	172,333	-0.1%	-115	
31	57,402	57,444	-0.1%	54,116	343	2,009	486	335					43,374
32	57,657	57,444	0.4%	48,548	561	7,662	547	224					43,309
33	57,550	57,444	0.2%	53,245	685	1,938	1,348	231					42,606
									172,609	172,333	0.2%	276	
34	57,792	57,444	0.6%	48,823	938	1,462	5,729	576					44,335
35	57,101	57,444	-0.6%	54,693	373	606	148	976					45,325
36	56,952	57,444	-0.9%	49,005	246	864	225	6,500					46,325
									171,845	172,333	-0.3%	-488	
37	57,148	57,444	-0.5%	52,096	515	3,659	474	291					43,467
38	57,476	57,444	0.1%	53,440	522	2,560	582	248					43,114
39	57,449	57,444	0.0%	53,326	1,368	2,001	309	354					44,980
									172,073	172,333	-0.2%	-260	
40	57,476	57,444	0.1%	54,275	305	2,101	322	396					45,557
41	57,716	57,444	0.5%	55,001	618	1,144	540	288					43,213
42	57,074	57,444	-0.6%	52,156	963	2,579	498	766					44,452
									172,266	172,333	0.0%	-67	
43	58,005	57,444	1.0%	52,755	1,051	3,350	646	302					45,924
44	57,165	57,444	-0.5%	50,883	1,949	3,906	974	284					43,012
45	57,286	57,444	-0.3%	41,769	6,755	7,424	701	367					41,516
									172,456	172,333	0.1%	123	
46	57,522	57,444	0.1%	50,559	2,766	1,870	1,780	280					41,987
47	57,482	57,444	0.1%	50,537	1,726	3,331	1,438	279					43,363
48	57,102	57,444	-0.6%	46,806	4,008	3,918	1,677	360					44,616
									172,106	172,333	-0.1%	-227	
49	57,340	57,444	-0.2%	55,297	689	712	374	207					44,997
50	57,277	57,444	-0.3%	53,771	787	1,466	345	823					44,098
51	57,141	57,444	-0.5%	54,700	306	1,436	328	187					42,919
									171,758	172,333	-0.3%	-575	
52	57,374	57,444	-0.1%	51,162	1,418	3,157	1,013	509					44,533
53	56,789	57,444	-1.1%	52,844	1,648	1,030	768	399					43,931
54	57,158	57,444	-0.5%	50,552	2,234	1,579	1,952	615					46,935
									171,321	172,333	-0.6%	-1,012	
55	57,308	57,444	-0.2%	51,484	960	3,006	1,186	539					43,613
56	57,124	57,444	-0.6%	52,613	555	1,907	1,576	345					42,974
57	58,032	57,444	1.0%	49,787	1,289	2,829	3,591	338					44,147
									172,464	172,333	0.1%	131	
58	57,683	57,444	0.4%	54,493	614	1,648	314	316					43,680
59	57,290	57,444	-0.3%	54,480	747	1,161	462	343					44,339
60	57,825	57,444	0.7%	52,515	1,732	1,334	2,048	220					43,954
									172,798	172,333	0.3%	465	
61	57,255	57,444	-0.3%	34,039	11,444	10,411	714	369					41,674
62	57,148	57,444	-0.5%	37,072	10,090	8,537	804	382					43,284
63	57,475	57,444	0.1%	51,849	1,405	2,987	777	319					44,305
									171,878	172,333	-0.3%	-455	
64	57,697	57,444	0.4%	38,970	6,912	10,051	942	428					43,185
65	57,345	57,444	-0.2%	45,402	3,906	6,570	848	358					42,332
66	57,325	57,444	-0.2%	50,417	1,451	3,794	1,169	327					42,095
									172,367	172,333	0.0%	34	
67	57,622	57,444	0.3%	55,353	458	729	602	419					43,626
68	57,414	57,444	-0.1%	51,763	776	991	2,243	472					43,983
69	57,930	57,444	0.8%	53,873	273	687	282	2,677					45,809
									172,966	172,333	0.4%	633	
70	56,961	57,444	-0.8%	54,460	332	1,034	759	311					44,051
71	57,716	57,444	0.5%	53,038	545	1,668	1,987	348					45,988
72	57,307	57,444	-0.2%	52,674	1,002	1,718	988	794					45,544
									171,984	172,333	-0.2%	-349	
73	57,760	57,444	0.5%	53,478	813	667	549	2,068					45,535
74	57,853	57,444	0.7%	49,308	262	795	272	7,072					46,067
75	57,445	57,444	0.0%	53,972	579	1,040	339	1,414					44,940
									173,058	172,333	0.4%	725	
76	57,289	57,444	-0.3%	44,547	4,648	3,498	3,969	316					46,534
77	58,025	57,444	1.0%	44,216	2,069	2,590	8,493	284					48,456
78	57,375	57,444	-0.1%	40,887	6,279	5,737	3,589	435					49,819
									172,689	172,333	0.2%	356	
79	57,866	57,444	0.7%	46,970	3,339	5,028	2,047	206					42,865
80	57,684	57,444	0.4%	54,980	458	1,517	447	205					43,455
81	58,042	57,444	1.0%	48,093	3,739	3,303	2,338	281					44,491
									173,592	172,333	0.7%	1,259	
82	57,087	57,444	-0.6%	45,764	1,735	7,599	1,517	315					44,137
83	57,989	57,444	0.9%	52,834	1,683	1,831	1,226	285					44,285
84	57,011	57,444	-0.8%	53,300	371	1,327	1,686	212					43,864
									172,088	172,333	-0.1%	-245	
85	56,909	57,444	-0.9%	52,556	309	1,147	435	2,348					44,411
86	57,707	57,444	0.5%	54,846	396	888	1,439	242					42,760
87	57,157	57,444	-0.5%	53,367	478	2,197	403	603					41,543
									171,773	172,333	-0.3%	-560	
88	57,726	57,444	0.5%	39,833	2,308	11,299	2,464	1,548					43,088
89	57,836	57,444	0.7%	55,080	520	893	573	676					43,572
90	57,539	57,444	0.2%	45,964	2,246	3,383	2,403	3,217					44,214
									173,101	172,333	0.4%	768	
91	57,913	57,444	0.8%	55,027	204	1,088	224	270					44,354
92	57,481	57,444	0.1%	52,385	1,309	1,615	307	1,722					43,656
93	57,619	57,444	0.3%	53,452	693	1,027	1,866	424					46,153
									173,013	172,333	0.4%	680	
94	57,673	57,444	0.4%	52,084	1,031	849	3,144	415					43,483
95	56,965	57,444	-0.8%	52,333	1,182	892	1,976	391					46,693
96	57,179	57,444	-0.5%	55,018	570	965	259	261					42,218
									171,817	172,333	-0.3%	-516	
97	57,304	57,444	-0.2%	50,576	843	1,460	4,078	140					44,364
98	58,028	57,444	1.0%	54,588	558	1,195	1,315	254					43,682
99	57,747	57,444	0.5%	54,730	396	1,597	630	300					43,382
									173,079	172,333	0.4%	746	
Totals:	5,686,986	5,686,986	0.0%	4,738,411	380,440	334,054	143,831	48,593	5,686,986	5,686,986	0.0%	0	4,347,494
DISTRICT	TAPERSONS	Target	Dev.	WHITE	BLACK	HISPANIC	ASIAN	AMINDIAN	Senate	Target	Dev.	Difference	PERSONS18

BLACK18	HISPANIC18	ASIAN18	AMINDIAN18	BLACK18 %	BLACK %	HISPANIC18 %	HISPANIC %	ASIAN18 %	ASIAN %	GOVDEM10	GOVREP10	DEM%	PRESDEM08	PRESREP08	DEM%	GOV_DEM06	GOV_REP06	DEM%	PRESDEM04	PRESREP04	DEM%	GOV_DEM02	GOV_REP02	DEM%	DEM TOTAL	REP TOTAL	Total_Votes	DEM %	REP %	Off Percent	Favored	DISTRICT
186	698	433	204	0.4%	0.6%	1.6%	2.2%	1.0%	1.3%	8,411	15,807	34.7%	15,951	16,186	49.6%	11,310	13,260	46.0%	13,017	17,187	43.1%	8,457	10,063	45.7%	48,735	56,696	105,431	46.2%	[illegible]	7.1%	R	1
358	1,197	884	1,619	0.8%	1.4%	2.8%	3.9%	2.1%	2.6%	10,160	9,793	50.9%	17,427	11,621	60.0%	11,691	9,377	55.5%	13,496	14,137	48.8%	7,705	6,594	53.9%	50,319	41,729	91,048	54.7%	45.3%	1.3%	D	2
147	738	363	255	0.4%	0.6%	1.8%	2.4%	0.9%	1.1%	7,525	13,799	35.3%	14,469	15,532	48.2%	9,530	12,024	44.2%	10,254	15,793	39.4%	5,484	7,631	41.8%	39,737	50,981	90,718	43.8%	[illegible]	9.6%	R	3
																									138,791	149,406	288,197	48.2%	51.8%	5.2%	R	
911	1,057	922	541	2.1%	2.9%	2.4%	3.3%	2.1%	2.6%	9,475	13,066	42.0%	16,418	14,575	53.0%	10,872	12,106	47.3%	12,263	16,787	42.3%	7,443	8,544	46.6%	46,996	52,012	99,008	47.5%	52.5%	5.9%	R	4
73	996	186	435	0.2%	0.4%	2.3%	3.1%	0.4%	0.5%	7,201	11,339	38.8%	14,030	12,974	52.0%	9,204	10,995	45.6%	11,485	16,650	40.8%	5,714	7,773	42.4%	40,433	48,392	88,825	45.5%	54.5%	7.9%	R	5
108	515	268	1,358	0.2%	0.5%	1.2%	1.5%	0.6%	0.7%	7,692	13,463	36.4%	14,240	14,838	49.0%	9,542	12,589	43.1%	11,810	17,740	40.0%	6,397	8,902	41.8%	41,989	54,069	96,058	43.7%	56.3%	9.7%	R	6
																									129,418	154,473	283,891	45.6%	54.4%	7.8%	R	
1,248	4,295	1,447	486	2.7%	3.6%	9.4%	12.1%	3.2%	3.5%	10,060	11,720	46.2%	15,760	13,656	53.6%	11,750	10,312	53.3%	15,568	15,839	49.6%	9,295	8,053	53.6%	52,373	47,860	100,233	52.3%	47.7%	1.1%	R	7
3,075	25,334	706	535	8.2%	9.5%	67.8%	71.8%	1.9%	1.9%	4,521	1,264	78.2%	9,195	1,865	83.1%	4,027	1,396	74.3%	8,671	2,921	74.8%	2,849	1,013	73.4%	24,742	7,215	31,957	77.4%	22.6%	24.0%	D	8
2,179	14,436	1,226	600	5.4%	8.2%	45.7%	53.2%	3.0%	3.1%	7,594	4,334	63.7%	12,963	5,529	70.1%	7,971	4,371	64.6%	12,927	7,465	63.4%	6,125	3,500	63.6%	39,986	20,865	60,851	65.7%	34.3%	12.3%	D	9
376	647	1,217	316	0.8%	1.3%	1.4%	1.8%	2.6%	2.2%	10,691	11,076	49.1%	19,449	13,055	59.8%	13,126	9,867	57.1%	17,357	15,248	53.2%	9,324	7,524	55.3%	59,256	45,694	104,950	56.5%	43.5%	3.1%	D	93
																									155,487	122,731	278,218	55.9%	44.1%	2.5%	D	
445	478	1,842	301	1.0%	1.8%	1.1%	1.5%	4.2%	5.5%	9,358	10,950	46.1%	17,672	12,218	59.1%	10,935	8,518	56.2%	14,368	14,015	50.6%	6,834	6,134	52.7%	49,809	40,895	90,704	54.9%	45.1%	1.5%	D	94
704	611	1,330	275	1.5%	2.1%	1.3%	1.6%	2.8%	3.5%	11,280	9,803	53.5%	20,851	11,482	64.5%	13,695	8,703	61.1%	18,472	13,982	56.9%	8,403	6,442	56.6%	61,421	40,609	102,030	60.2%	39.8%	6.8%	D	95
341	537	152	195	0.8%	1.0%	1.3%	1.7%	0.4%	0.5%	9,540	9,891	49.1%	15,765	9,947	61.3%	11,278	8,082	58.3%	14,629	12,691	53.5%	6,369	5,374	54.2%	48,041	36,094	84,135	57.1%	42.9%	3.7%	D	96
																									159,271	117,598	276,869	57.5%	42.5%	4.1%	D	
526	861	2,722	101	1.2%	1.5%	1.9%	2.5%	6.1%	7.1%	9,003	22,543	28.5%	13,561	24,328	35.8%	9,950	19,938	33.3%	11,579	26,153	30.6%	6,968	17,558	28.4%	42,058	88,077	130,135	32.3%	67.7%	21.1%	R	97
292	676	799	192	0.7%	1.0%	1.5%	2.1%	1.8%	2.3%	6,710	21,683	23.6%	11,167	22,789	32.9%	8,141	17,364	31.9%	9,717	24,072	28.8%	5,512	13,108	29.6%	34,537	77,333	111,870	30.9%	69.1%	22.5%	R	98
178	887	359	197	0.4%	0.7%	2.0%	2.8%	0.8%	1.1%	6,001	18,887	24.1%	11,324	20,441	35.6%	7,570	15,261	33.2%	9,444	22,458	29.6%	5,024	11,224	30.9%	33,362	69,384	102,746	32.5%	67.5%	20.9%	R	99
																									109,957	234,794	344,751	31.9%	68.1%	21.5%	R	
242,598	199,822	83,260	47,511	5.6%	6.7%	4.6%	5.9%	2.1%	2.5%	1,004,343	1,128,985	47.1%	1,677,112	1,262,318	57.1%	1,117,859	978,368	53.3%	1,481,352	1,471,444	50.2%	800,434	734,711	52.1%	5,096,757	4,446,861	9,543,618	53.4%	46.6%	0.0%	Even	Totals:
BLACK18	HISPANIC18	ASIAN18	AMINDIAN18	BLACK18 %	BLACK %	HISPANIC18 %	HISPANIC %	ASIAN18 %	ASIAN %	GOVDEM10	GOVREP10	DEM%	PRESDEM08	PRESREP08	DEM%	GOV_DEM06	GOV_REP06	DEM%	PRESDEM04	PRESREP04	DEM%	GOV_DEM02	GOV_REP02	DEM%	Dem	Rep	Total_Votes	DEM %	REP %	Off Percent		DISTRICT

Rep. Kessler's Plan D - Exec Elections (SENATE ONLY)

DISTRICT	TAPERSONS	Target	Dev.	WHITE	BLACK	HISPANIC	ASIAN	AMINDIAN	PERSONS18	BLACK18	HISPANIC18	ASIAN18	AMINDIAN18	BLACK18 %	BLACK %	HISPANIC18 %	HISPANIC %	ASIAN18 %	ASIAN %	GOVDEM10	GOVREP10	DEM%	PRESDEM08	PRESREP08	DEM%	GOV_DEM06	GOV_REP06	DEM%	PRESDEM04	PRESREP04	DEM%	GOV_DEM02	GOV_REP02	DEM%	DEM TOTAL	REP TOTAL	Total_Votes	DEM %	REP %	Off Percent	Favored	DISTRICT
1	171,856	172,333	-0.3%	159,198	1,521	4,851	2,693	3,051	127,332	691	2,633	1,680	2,078	0.5%	0.9%	2.1%	2.0%	1.3%	1.7%	26,095	39,399	39.8%	47,847	43,339	52.5%	32,531	34,661	48.4%	36,767	47,117	43.8%	21,646	24,289	47.1%	138,791	149,406	288,197	48.2%	51.8%	5.2%	R	1
2	171,947	172,333	-0.2%	159,625	1,775	4,548	2,174	3,492	130,347	1,092	2,568	1,376	2,334	0.8%	1.0%	2.0%	2.0%	1.1%	1.3%	24,368	37,868	39.2%	44,688	42,387	51.3%	29,618	35,690	45.4%	35,558	51,177	41.0%	19,554	25,219	43.7%	129,418	154,473	283,891	45.6%	54.4%	7.8%	R	2
3	172,821	172,333	0.3%	74,601	11,101	79,189	4,869	2,238	123,438	6,502	48,065	3,379	1,621	5.3%	6.4%	38.9%	45.8%	2.7%	2.9%	22,175	17,318	56.1%	37,918	21,050	64.3%	23,748	16,079	59.6%	37,166	26,225	58.9%	18,269	12,586	59.2%	117,101	75,940	193,041	60.7%	39.3%	7.3%	D	3
4	172,557	172,333	0.1%	58,735	96,466	6,624	8,231	853	121,127	61,851	3,870	4,876	602	51.1%	55.9%	3.2%	3.3%	4.0%	4.8%	43,766	19,144	69.6%	65,537	21,566	75.2%	35,857	18,627	65.8%	58,134	27,921	67.6%	28,310	16,382	63.3%	187,838	84,496	272,334	69.0%	31.0%	15.6%	D	4
5	172,767	172,333	0.3%	142,783	10,360	11,937	5,406	1,524	136,013	6,436	7,019	3,715	1,087	4.7%	6.0%	5.2%	6.9%	2.7%	3.1%	34,162	40,499	45.8%	50,944	45,787	52.7%	36,757	36,298	50.3%	47,424	52,968	47.2%	27,572	29,378	48.4%	162,697	164,431	327,128	49.7%	50.3%	3.7%	R	5
6	171,019	172,333	-0.8%	53,495	99,426	8,224	7,262	979	124,703	65,884	5,351	4,803	726	52.8%	58.1%	4.3%	4.8%	3.9%	4.2%	45,754	11,877	79.4%	69,653	14,547	82.7%	37,820	12,254	75.5%	64,439	19,270	77.0%	28,996	9,794	74.8%	200,908	55,865	256,773	78.2%	21.8%	24.8%	D	6
7	173,366	172,333	0.6%	142,534	6,142	15,735	6,378	1,810	142,984	4,402	10,076	4,832	1,339	3.1%	3.5%	7.0%	9.1%	3.4%	3.7%	37,315	31,213	54.5%	57,853	36,786	61.1%	40,889	27,768	59.6%	54,931	42,373	56.5%	28,483	19,433	59.4%	182,156	126,360	308,516	59.0%	41.0%	5.6%	D	7
8	172,126	172,333	-0.1%	126,478	34,174	5,857	4,026	737	129,125	22,833	3,534	2,688	508	17.7%	19.9%	2.7%	3.4%	2.1%	2.3%	39,364	40,107	49.5%	57,847	43,473	57.1%	39,202	34,543	53.2%	49,870	46,916	51.5%	29,343	28,707	50.5%	176,262	153,639	329,901	53.4%	46.6%	0.0%	Even	8
9	171,208	172,333	-0.7%	151,828	2,110	8,382	7,059	1,380	132,527	1,011	4,634	3,935	941	0.8%	1.2%	3.5%	4.9%	3.0%	4.1%	29,154	36,157	44.6%	51,008	37,728	57.5%	36,238	32,800	52.5%	46,042	45,655	50.2%	26,896	24,605	52.2%	160,184	140,798	300,982	53.2%	46.8%	0.2%	R	9
10	172,218	172,333	-0.1%	163,329	1,500	3,046	2,749	1,203	130,416	782	1,838	1,647	823	0.6%	0.9%	1.4%	1.8%	1.3%	1.6%	22,232	32,484	40.6%	45,867	43,709	51.2%	29,261	25,824	53.1%	42,054	45,231	48.2%	20,819	22,327	48.3%	138,001	137,091	275,092	50.2%	49.8%	3.2%	R	10
11	172,609	172,333	0.2%	155,909	1,589	11,609	2,381	790	129,289	708	6,662	1,425	544	0.5%	0.9%	5.2%	6.7%	1.1%	1.4%	20,182	51,738	28.1%	36,473	56,135	39.4%	23,916	42,105	36.2%	30,424	60,804	33.3%	16,470	31,439	34.4%	107,283	190,583	297,866	36.0%	64.0%	17.4%	R	11
12	171,845	172,333	-0.3%	152,521	1,557	2,932	6,302	8,052	135,985	730	1,621	3,568	5,324	0.5%	0.5%	1.2%	1.7%	2.6%	3.7%	28,969	37,202	43.8%	50,530	40,837	59.9%	36,520	31,308	53.9%	44,963	49,130	47.8%	26,423	24,431	52.0%	158,436	145,706	304,142	52.1%	47.9%	1.3%	R	12
13	172,073	172,333	-0.2%	158,862	2,405	8,220	1,365	893	131,561	1,715	4,798	834	669	1.3%	1.4%	3.6%	4.8%	0.6%	0.8%	24,001	41,990	36.4%	41,505	46,131	47.4%	29,286	36,536	44.5%	35,146	52,792	40.0%	19,430	26,136	42.6%	125,367	161,595	286,962	43.7%	56.3%	9.7%	R	13
14	172,266	172,333	0.0%	161,432	1,886	5,824	1,360	1,450	133,222	1,137	3,385	846	999	0.9%	1.1%	2.5%	3.4%	0.6%	0.8%	30,978	34,082	47.6%	50,930	37,290	57.7%	35,471	29,948	54.2%	43,469	45,423	48.9%	23,032	19,990	53.5%	152,902	132,651	285,553	53.5%	46.5%	0.1%	D	14
15	172,456	172,333	0.1%	145,407	9,755	13,480	2,321	953	131,452	5,941	7,613	1,565	694	4.5%	5.7%	5.8%	7.8%	1.2%	1.3%	28,452	25,702	52.5%	54,173	30,109	64.3%	35,475	22,009	61.7%	49,246	36,176	57.7%	27,717	16,143	63.2%	166,611	104,437	271,048	61.5%	38.5%	8.1%	D	15
16	172,106	172,333	-0.1%	147,902	8,500	9,129	4,895	919	129,966	4,438	5,326	3,012	635	3.4%	4.9%	4.1%	5.9%	2.3%	2.8%	42,905	26,943	61.4%	62,218	29,205	68.1%	43,325	23,079	65.2%	52,939	36,114	59.4%	27,889	16,314	63.1%	186,371	104,712	291,083	64.0%	36.0%	10.6%	D	16
17	171,758	172,333	-0.3%	163,768	1,782	3,614	1,047	1,317	132,024	1,228	2,162	661	901	0.9%	1.0%	1.6%	2.1%	0.5%	0.6%	27,453	29,873	47.9%	49,682	31,131	61.5%	32,598	25,416	56.2%	43,513	41,194	51.4%	20,470	17,175	54.4%	146,263	114,916	261,179	56.0%	44.0%	2.6%	D	17
18	171,321	172,333	-0.6%	154,558	5,300	5,766	3,733	1,533	135,399	4,045	3,445	2,333	1,222	3.0%	3.1%	2.5%	3.4%	1.7%	2.2%	25,301	34,545	42.3%	44,476	40,585	52.3%	29,874	31,737	48.5%	37,268	49,449	43.0%	20,445	25,032	45.0%	132,063	146,803	278,866	47.4%	52.6%	6.0%	R	18
19	172,464	172,333	0.1%	153,884	2,804	7,542	6,353	1,422	130,734	1,389	4,319	3,826	1,038	1.1%	1.6%	3.3%	4.6%	2.9%	3.7%	28,358	35,335	44.3%	49,261	39,324	55.6%	34,328	33,135	50.9%	40,165	47,915	45.6%	21,357	24,435	46.6%	145,111	144,805	289,920	50.1%	49.9%	3.3%	R	19
20	172,798	172,333	0.3%	161,488	3,093	3,943	3,024	879	131,873	1,939	2,148	1,815	611	1.5%	1.8%	1.6%	2.3%	1.4%	1.8%	21,062	57,709	26.7%	36,354	61,884	37.0%	25,945	47,408	35.4%	30,386	67,162	31.1%	17,395	35,954	32.6%	110,080	212,408	322,488	34.1%	65.9%	19.3%	R	20
21	171,878	172,333	-0.3%	122,960	22,939	21,935	2,295	1,070	129,263	14,998	12,964	1,575	797	11.6%	13.3%	10.0%	12.8%	1.2%	1.3%	28,573	32,909	46.5%	48,721	37,347	56.6%	31,591	28,937	52.2%	44,151	43,683	50.3%	25,353	22,206	53.3%	149,816	132,173	281,989	53.1%	46.9%	0.3%	R	21
22	172,367	172,333	0.0%	134,789	12,269	20,415	2,959	1,113	127,612	7,296	11,792	2,056	808	5.7%	7.1%	9.2%	11.6%	1.6%	1.7%	23,622	25,696	47.9%	46,939	32,383	59.2%	28,486	21,910	56.5%	40,652	36,206	52.0%	22,133	15,051	59.5%	138,210	105,550	243,760	56.7%	43.3%	3.3%	D	22
23	172,966	172,333	0.4%	161,989	1,507	2,407	3,127	3,568	133,438	695	1,350	1,819	2,327	0.5%	0.5%	1.0%	1.4%	1.4%	1.8%	27,598	34,233	44.6%	49,854	38,721	56.3%	35,077	28,721	55.0%	46,689	45,222	50.8%	25,192	22,398	52.9%	156,832	135,062	291,874	53.7%	46.3%	0.3%	D	23
24	171,984	172,333	-0.2%	160,172	1,879	4,420	3,734	1,453	135,583	1,167	2,661	2,317	1,039	0.9%	1.1%	2.0%	2.6%	1.7%	2.2%	31,047	33,537	48.1%	54,543	35,926	60.3%	39,720	27,338	59.2%	48,311	43,746	52.5%	27,091	18,395	59.6%	169,665	125,405	295,070	57.5%	42.5%	4.1%	D	24
25	173,058	172,333	0.4%	156,756	1,654	2,507	1,160	10,554	136,562	878	1,411	722	7,181	0.6%	1.0%	1.0%	1.4%	0.9%	0.7%	32,345	31,528	50.6%	54,978	37,755	59.3%	39,028	26,934	59.2%	53,293	42,101	55.9%	32,997	23,119	58.8%	180,296	129,909	310,205	58.1%	41.9%	4.7%	D	25
26	172,689	172,333	0.2%	129,650	12,996	11,825	16,051	1,035	144,809	8,401	8,067	12,631	843	5.8%	7.5%	5.6%	6.6%	8.7%	9.3%	64,364	17,298	78.8%	86,552	19,539	81.6%	64,739	15,493	87.7%	79,626	25,208	76.0%	41,858	11,875	77.9%	272,775	72,115	344,890	79.1%	20.9%	25.7%	D	26
27	173,592	172,333	0.7%	150,045	7,536	9,848	4,832	692	130,811	4,368	5,977	3,086	511	3.3%	4.3%	4.6%	5.7%	2.4%	2.8%	44,464	28,688	60.8%	63,565	30,119	67.9%	45,208	23,813	65.5%	54,012	36,716	59.5%	30,049	16,855	64.1%	192,834	107,503	300,337	64.2%	35.8%	10.8%	D	27
28	172,088	172,333	-0.1%	151,898	3,789	10,757	4,429	812	132,286	2,610	6,510	2,884	566	2.0%	2.2%	4.9%	6.5%	2.2%	2.6%	23,249	52,558	30.7%	38,601	57,758	40.1%	27,052	43,132	38.5%	33,894	61,147	35.7%	19,332	32,907	37.0%	118,879	194,944	313,823	37.9%	62.1%	15.5%	R	28
29	171,773	172,333	-0.3%	160,769	983	4,232	2,277	3,193	128,754	470	2,411	1,267	2,095	0.4%	0.6%	1.9%	2.5%	1.0%	1.3%	21,975	36,922	37.3%	41,734	39,340	51.5%	30,324	30,676	49.7%	35,416	47,807	42.6%	20,785	21,740	48.9%	128,259	139,563	267,822	47.9%	52.1%	5.5%	R	29
30	173,101	172,333	0.4%	140,855	5,074	15,575	5,440	5,441	130,894	2,694	8,730	3,328	3,754	2.1%	2.9%	6.7%	9.0%	2.5%	3.1%	25,560	29,562	46.4%	46,763	34,251	57.7%	31,775	29,577	51.8%	40,599	43,835	48.1%	21,516	20,732	50.9%	140,653	128,395	269,048	52.3%	47.7%	1.1%	R	30
31	173,013	172,333	0.4%	160,864	2,206	4,730	2,397	2,416	134,163	1,583	2,832	1,557	1,633	1.2%	1.3%	2.1%	2.7%	1.2%	1.4%	27,606	31,015	47.1%	49,758	34,961	58.7%	34,631	26,646	56.5%	46,596	41,300	53.0%	24,502	19,824	55.3%	155,487	122,731	278,218	55.9%	44.1%	2.5%	D	31
32	173,817	172,333	-0.3%	159,435	2,783	7,706	5,379	1,077	132,394	1,490	1,616	3,324	771	1.1%	1.6%	1.2%	1.6%	2.5%	3.1%	30,178	30,644	49.6%	54,288	33,647	61.7%	35,908	25,303	58.7%	47,469	40,698	53.8%	21,606	17,950	54.6%	159,271	117,598	276,869	57.5%	42.5%	4.1%	D	32
33	173,079	172,333	0.4%	159,892	1,799	4,252	6,023	694	131,428	996	2,424	3,880	490	0.8%	1.0%	1.8%	2.5%	3.0%	3.5%	21,714	63,113	25.6%	36,052	67,558	34.8%	25,661	52,563	32.9%	30,740	72,783	29.7%	17,504	41,830	29.5%	109,957	234,794	344,751	31.9%	68.1%	21.5%	R	33
Totals:	5,686,986	5,686,986	0.0%	4,738,411	380,660	336,056	143,931	68,593	4,347,494	242,398	199,822	93,260	47,511	5.6%	6.7%	4.6%	5.9%	2.3%	2.5%	1,004,242	1,128,885	47.1%	1,677,112	1,262,318	57.1%	1,137,859	978,368	53.8%	1,481,352	1,471,464	50.2%	800,434	734,711	52.1%	5,096,757	4,446,861	9,543,618	53.4%	46.6%	0.0%	Even	Totals:
DISTRICT	TAPERSONS	Target	Dev.	WHITE	BLACK	HISPANIC	ASIAN	AMINDIAN	PERSONS18	BLACK18	HISPANIC18	ASIAN18	AMINDIAN18	BLACK18 %	BLACK %	HISPANIC18 %	HISPANIC %	ASIAN18 %	ASIAN %	GOVDEM10	GOVREP10	DEM%	PRESDEM08	PRESREP08	DEM%	GOV_DEM06	GOV_REP06	DEM%	PRESDEM04	PRESREP04	DEM%	GOV_DEM02	GOV_REP02	DEM%	Dem	Rep	Total_Votes	DEM %	REP %	Off Percent		DISTRICT